ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

1508 Lady Street
COLUMBIA, SOUTH CAROLINA 29201
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

July 3, 2012

VIA E FILING

Jocelyn D. Boyd, Esquire Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

RE:

Application of Global Connection, Inc. of America d/b/a Stand Up Wireless

Docket No. 2012-167-C

Dear Ms. Boyd:

Enclosed please find for filing the Response of Global Connection, Inc. of America d/b/a Stand Up Wireless' to the South Carolina Office of Regulatory Staff's Motion to Dismiss the Company's Application for designation as an Eligible Telecommunications Carrier. By copy of this letter, I am serving the Office of Regulatory Staff.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/mjl

Enclosures

cc:

Nanette S. Edwards, Esquire w/enclosures

Lance J.M. Steinhart, Esquire

BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2012-167-C

IN RE:

Application of Global Connection, Inc. of America d/b/a STAND UP WIRELESS for Designation as an Eligible Telecommunications Carrier

RESPONSE OF GLOBAL CONNECTION INC. OF AMERICA D/B/A STAND UP WIRELESS

Global Connection Inc. of America d/b/a STAND UP WIRELESS ("Stand Up Wireless" or the "Company") hereby responds to the South Carolina Office of Regulatory Staff's ("ORS") Motion to Dismiss the Company's Application for designation as an Eligible Telecommunications Carrier ("ETC").

On December 16, 2011 in Docket No. 2011-329-C, Global Connection Inc. of America ("Global Connection") sought a waiver of the bond requirement in 26 S.C. Code Ann. Regs. 103-607 (Supp. 2011) ("Regulation 103-607"); however, Global Connection's request for wavier was denied in Order No. 2012-175 on February 29, 2012. Therefore, on June 29, 2012, Global Connection filed with the Commission a Certificate of Deposit that met the bond requirement in Regulation 103-607.

WHEREFORE, the Company asserts that it is in compliance with Commission rules and regulations and respectfully submits that there is no remaining impediment to designation of Stand Up Wireless as an ETC in South Carolina.

Respectfully Submitted,

Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street Columbia, SC 29201 (803) 771-0555 (Phone) (803) 771-8010 (Fax) selliott@elliottlaw.us (Email)

and

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
lsteinhart@telecomcounsel.com (Email)

Attorneys for Global Connection Inc. of America d/b/a STAND UP WIRELESS

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Application of Global Connection Inc of America d/b/a

Stand Up Wireless

DOCKET NO .:

2012-167-C

PARTIES SERVED:

Nanette S. Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900

Columbia, SC 29201

PLEADING:

Global Connection Inc of America d/b/a Stand Up

Wireless' Response to South Carolina Office of Regulatory Staff's Motion to Dismiss the Company's Application for designation as an Eligible Telecommunications Carrier

July 3, 2012

MaryJo Lawracy, Legal Assistant